

# **EXHIBIT 1**



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

September 22, 2023

National Registered Agents, Inc.  
1999 Bryan Street, Suite 900  
Dallas, Texas 75201

*Via CMRRR: 7019 1120 0000 5730 8231*

**RE: Notice of Intent to File Suit against Yelp, Inc.**

Dear National Registered Agents, Inc. Representative:

Pursuant to section 17.47(a) of the Texas Business and Commerce Code, the Consumer Protection Division of the Office of the Attorney General of Texas provides notice to Yelp, Inc. (herein “Yelp”) that our office believes that Yelp’s business practices have violated the Texas Deceptive Trade Practices – Consumer Protection Act, sections 17.41 - 17.63 (hereinafter “DTPA”), by engaging in false, misleading, or deceptive acts and practices related to Yelp’s “consumer notices” on the Yelp business pages of pregnancy resource centers, misleadingly stating that these centers “typically provide limited medical services and may not have licensed medical professionals onsite.”

Under sections 17.46(a) and 17.46(b) of the Texas Business and Commerce Code, it is unlawful to use false, misleading, or deceptive acts or practices in the conduct of any trade or commerce including: (a) causing confusion or misunderstanding as to the source sponsorship, approval, or certification of goods or services; (b) causing confusion or misunderstanding as to affiliation connection, or association with, or certification by, another; (c) disparaging the goods, services, or business of another by providing a false or misleading representation of facts; and (d) failing to disclose information concerning goods or services which was known at the time of the transaction if such failure to disclose such information was intended to induce the consumer into a transaction into which the consumer would not have entered had the information been disclosed. A violation of these sections is a violation of the DTPA. The Consumer Protection Division of the Office of the Attorney General of Texas has investigated Yelp’s business practices and provides notice to you that we have concluded that Yelp has violated the DTPA.

The Office of the Attorney General of Texas is authorized to seek the following for DTPA violations: civil penalties of up to \$10,000.00 per violation, an injunction to enjoin the deceptive trade practices, attorneys’ fees, court costs, and restitution of all money unlawfully taken from consumers. The above-referenced statute authorizes the Office of the Attorney General of Texas to file suit after seven days from the date on which you are contacted and informed of the alleged unlawful conduct.

Please contact me if you have any questions or would like to discuss this matter.

Sincerely,

Scott Froman  
Assistant Attorney General  
Consumer Protection Division  
(512) 463-1264 (telephone)  
(512) 473-8301 (facsimile)